

Yvonne Iglesias

April 17, 2023  
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2 MI FAMILIA VOTA, et al., )

3 Plaintiffs, ) Case No.

4 vs. ) 5:21-CV-0920-XR

5 GREG ABBOTT, et al., )

6 Defendants. )

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8 UNITED STATES OF AMERICA, )

9 Plaintiff, ) Case No.

10 vs. ) 5:21-CV-1085-XR

11 THE STATE OF TEXAS, et al., )

12 Defendants. )

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15 ORAL/VIDEOTAPED DEPOSITION OF

16 YVONNE IGLESIAS

17 APRIL 17, 2023

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20 ORAL/VIDEOTAPED DEPOSITION OF YVONNE IGLESIAS,

21 produced as a witness at the instance of the

22 Defendants, and duly sworn, was taken in the

23 above-styled and numbered cause on April 17, 2023, from

24 10:00 a.m. to 12:26 p.m., Nilda Codina, Notary in and

25 for the State of Texas, recorded by machine shorthand,

remotely from Edinburg, Texas, County of Hidalgo,

pursuant to the Federal Rules of Civil Procedure, the

current Emergency Order regarding the COVID-19 State of

Disaster, and the provisions stated on the record or

attached hereto.

1 Q. Do you know the particular location?

2 A. I don't know the exact address.

3 Q. Okay. That's fine. Have you ever voted  
4 there in-person before?

5 A. I'm not sure.

6 Q. Okay. How far away is it from your house?

7 A. I'm not sure.

8 Q. Now, I know you've mentioned -- I know you  
9 mentioned a car accident in the past. Are you  
10 currently able to drive?

11 A. No.

12 Q. Okay. So is there a particular way you go --  
13 a particular way you get to places?

14 A. Through ambulance.

15 Q. Okay. Do any of your family members own a  
16 car?

17 A. Yes.

18 Q. Has that car been available for you to use,  
19 have they taken you places?

20 A. Yes.

21 Q. Okay. Do they frequently take you to places,  
22 or how often is that?

23 A. No.

24 Q. Okay.

25 A. Once -- sorry.

1 general?

2 MS. SNEAD: Objection, form.

3 A. I don't have a wheelchair. It's -- I have to  
4 go by ambulance and very difficult to stay on my wounds  
5 for a very long time. I can't sit.

6 Q. (BY MR. SZUMANSKI) Okay. Do you have any  
7 type of assistance that's provided to you on a daily  
8 basis?

9 A. Yes.

10 Q. And what type of assistance do you receive?

11 A. Provider services. Nurses' care. Home  
12 health.

13 Q. So that's -- just to make sure I'm  
14 understanding, that's a daily assistance, I'm assuming?

15 A. Yes.

16 Q. Okay. Is it throughout the entire day? Is  
17 it a 24-hour thing, or can you just kind of tell me  
18 generally what that's about?

19 MS. SNEAD: Objection, form.

20 A. It's daily, 24-hour care.

21 Q. (BY MR. SZUMANSKI) Okay. Now, you said you  
22 travel outside of your house around once a year.

23 Would you mind telling me what you're  
24 traveling to?

25 MS. SNEAD: Objection, form.

1 A. My son is the only one that could pick me up  
2 and put me in the car and he works out of town. And he  
3 tries to take me somewhere to get out of the house for  
4 just a little bit and -- you know, because I'm stuck  
5 here 24/7. It's really difficult.

6 Q. (BY MR. SZUMANSKI) Understandable.  
7 Understandable. So outside of traveling with your son,  
8 are there any other places you travel?

9 A. No.

10 Q. Okay. Now, Ms. Iglesias, I do want to talk a  
11 little bit, kind of switching topics and moving onto  
12 kind of your membership in REV UP Texas. I know that  
13 Exhibit 2 said you were a member of REV UP Texas.

14 Can you explain to me what REV UP Texas is?

15 A. They provide me with times of voting and how  
16 it is to help the disability and to give disability  
17 people help and be aware of things.

18 Q. Okay. And how long have you been a member of  
19 REV UP Texas?

20 A. November.

21 Q. Of 2022 or 2021?

22 A. I'm not sure.

23 Q. Okay. Have you been a member longer than a  
24 year?

25 A. No.

1 from REV UP Texas?

2 A. I don't -- I don't know.

3 Q. That's okay. That's okay. This is not --  
4 this is not a quiz.

5 A. Yeah.

6 Q. So you received emails from them. Let's move  
7 on a little bit and talk about The Arc of Texas. Okay?

8 So you're also a member of The Arc of Texas,  
9 correct?

10 A. Yes.

11 Q. Okay. What is that?

12 A. They help dis- -- disability people with, I  
13 guess, sources and housing, a lot of things. They --  
14 they help for us to be aware of and, you know -- with  
15 housing, things like that, you know.

16 Q. Okay. How long have you been a member of The  
17 Arc of Texas?

18 A. November.

19 Q. Okay. So you started being a member of both  
20 REV UP Texas and The Arc of Texas at the same time?

21 A. Yes.

22 Q. Okay. Do you get any benefits or services  
23 from being a member of The Arc of Texas?

24 A. No.

25 Q. So just like the -- your membership with REV

1 For this annual Application for Ballot by  
2 Mail, are you aware of whether it applied to the 2022  
3 primary election?

4 A. Yes.

5 Q. You're also aware that it likely applied to  
6 the 2022 general election, correct?

7 A. Correct.

8 Q. Okay. Now, are you aware of curbside voting?

9 A. Yes.

10 Q. Have you ever done curbside voting before?

11 A. I'm -- I'm not sure.

12 Q. Okay. Well, Ms. Iglesias, let's talk a  
13 little bit about Senate Bill 1. Are you aware that at  
14 the beginning of this we talked about the Texas  
15 legislature changing the voting laws in 2021 and what  
16 has now been termed "Senate Bill 1"?

17 A. Yes.

18 Q. Okay. What is understanding of those changes  
19 that were made to Senate Bill 1?

20 A. I'm not understanding.

21 Q. Sure. Well, let's break this down. So  
22 before Senate Bill 1 was passed, did you get  
23 information about proposed changes in the Texas  
24 election laws while they were still under consideration  
25 in 2021?

1 rejection and then called or if you called before  
2 receiving any type of notice?

3 A. I called be -- before, I believe.

4 Q. Okay. Okay. And when you called, did you  
5 call the election office?

6 A. I called the, yes election office here in  
7 Hidalgo.

8 Q. Do you --

9 MS. SNEAD: Ethan, can we take a break  
10 for five minutes?

11 MR. SZUMANSKI: Of course. Sure.

12 MS. SNEAD: Thanks.

13 MR. SZUMANSKI: We'll go back on the  
14 record at 10:55, I'm assuming?

15 MS. SNEAD: Yes, that's great.

16 MR. SZUMANSKI: Okay.

17 THE VIDEOGRAPHER: Going off the  
18 record at 10:50 a.m.

19 (Off the record.)

20 THE VIDEOGRAPHER: We are now back on  
21 the record at 10:56 a.m.

22 A. Yes, I was confused and I was really talking  
23 about November.

24 Q. (BY MR. SZUMANSKI) Okay. So do you have any  
25 recollection of what happened in the 2022 primary

1 election?

2 MS. SNEAD: Ethan, if you can say  
3 "months," when you say "election," I think that might  
4 be helpful?

5 MR. SZUMANSKI: Sure. Let me rephrase  
6 my question.

7 Q. (BY MR. SZUMANSKI) So Ms. Iglesias, did you  
8 vote in the March 1st, 2022 primary election in Texas?

9 A. I'm not sure.

10 Q. Is there anything that would refresh your  
11 recollection?

12 A. I'm not sure, sir.

13 Q. Is there a particular reason why you're  
14 having a particular remembering, right now?

15 A. I just do a lot of things during the day.  
16 And sometimes I can't recall until sometimes they bring  
17 up something, or you know, I -- I just have a lot of  
18 things going on and I have a major surgery coming up,  
19 and so I'm -- it's kind of hard to really remember.

20 Q. Understood. Would it surprise you if you had  
21 voted in the March 1st, 2022 primary election in Texas?

22 A. No.

23 Q. Why would it not surprise you?

24 A. Because I've been trying to make a difference  
25 and vote in honor of my -- my sister and other



1 your ballot was rejected, right?

2 A. Yes.

3 Q. Okay. Once you learned that your Application  
4 for Ballot by Mail had been rejected, what did you try  
5 to do to fix that problem?

6 A. I asked for another ballot and I mailed it in  
7 again and tried to correct what they said that was  
8 incorrect. And I know -- I be- -- I believe I know I  
9 did everything right, and then I did it again and it  
10 still got rejected.

11 Q. So when you resubmitted this Application for  
12 Ballot by Mail, did they tell you what was originally  
13 wrong with your initial application?

14 A. They said I didn't put my -- either my ID  
15 number or my registration voter's number. And I -- I  
16 know I always do. I mean, that's how they know who  
17 I -- you know, who voted.

18 Q. Is there a possibility that you may have  
19 misspelled a number or had a typo?

20 A. No.

21 Q. So when you resubmitted your Application for  
22 Ballot by Mail, did you do the exact same thing that  
23 you did on your initial application?

24 A. Yes.

25 Q. So you didn't make any changes to your

1 resubmitted application?

2 A. No, I just wrote down my information like I'm  
3 supposed to and submitted it.

4 Q. So just to make sure I'm understanding  
5 correctly: There was -- the same information on your  
6 initial Application for Ballot by Mail was the exact  
7 same information you put on your resubmitted  
8 Application for Ballot by Mail?

9 A. Yes.

10 Q. You didn't change one aspect of it?

11 A. No.

12 Q. Even though the election office had told you  
13 it was incorrect?

14 A. I wrote down everything that I was instructed  
15 to do on the paper.

16 Q. Did you consult or talk to anybody else in  
17 resubmitting this application to make sure it was going  
18 to be accepted this time?

19 A. No.

20 Q. So you didn't talk to election -- election  
21 officials in Hidalgo County, to see if they would help  
22 you?

23 A. No.

24 Q. Did you have anyone assist you in filling out  
25 this Application for Ballot by Mail?

1 MS. SNEAD: Objection, form.

2 A. No.

3 Q. (BY MR. SZUMANSKI) Did you do any reading on  
4 the Secretary of State's website, The Arc of Texas  
5 website or REV UP Texas' website to gain more  
6 information about how to submit an Application for  
7 Ballot by Mail?

8 A. No.

9 Q. So all you did was just read the instructions  
10 on the application and submit it, right?

11 A. Yes, I don't believe it's that hard. I mean,  
12 I'm in the my right mind. I know how to write, read,  
13 and I just did what the instructions were -- were  
14 telling me to do.

15 Q. Understood. So on this Application for  
16 Ballot by Mail, do you remember whether you put one of  
17 your ID numbers or both of your ID numbers?

18 A. I'm not sure.

19 Q. Would it surprise you if you had only put  
20 one?

21 A. No.

22 Q. So once you had finished with resubmitting  
23 your Application for Ballot by Mail, what happened  
24 after that, as far as your understanding of what  
25 happened with your application?

1 Q. So since you were not aware of any resources,  
2 did you do anything to try to become aware of  
3 additional resources, such as going through, doing a  
4 simple Google search or anything like that?

5 A. No.

6 Q. Is there a particular reason why you did not  
7 do a simple Google search or anything of the kind, to  
8 try to become more aware of voting resources?

9 A. At that time, my father had passed away, my  
10 sister and -- and daily basis of what I need to go  
11 through, and then wound care and the nurses and doctors  
12 and things that were going on, it was just a lot at the  
13 time and everyday life.

14 Q. I understand. And speaking of doctors and  
15 nurses and -- and all those types of people, did you  
16 ever ask them about the voting process, or just talk  
17 with anybody in your circle about questions you had  
18 related to voting?

19 MS. SNEAD: Objection, form.

20 A. No.

21 Q. (BY MR. SZUMANSKI) Did you talk to anybody  
22 about how to vote by mail more successfully in Texas?

23 A. Just my sister, when she was alive.

24 Q. And what did those conversations consist of?

25 A. She just always tried to tell me that I

1 sister, Ms. Iglesias, did she ever give you practical  
2 tips about voting my mail?

3 A. A long time ago she had introduced me into  
4 doing that because I didn't know that I could vote  
5 through mail, ballot through mail.

6 Q. So would it be fair to say, Ms. Iglesias,  
7 that if you had been more aware of the resources out  
8 there, that it is possible that your Application for  
9 Ballot by Mail, in the November 8th general election in  
10 2022, in Texas, possibly could have been accepted?

11 A. Yes.

12 Q. Why would you say that?

13 A. I would have known who to turn to and be more  
14 educated on things I can do and be aware.

15 Q. Is there anything you wished you would have  
16 done differently, in the 2022 general election, in  
17 Texas, as far as submitting your Application for  
18 Ballot by Mail?

19 A. No, I just wanted my vote to count for my  
20 sister -- it meant a lot to me.

21 (Witness crying.)

22 Q. (BY MR. SZUMANSKI) I understand. Thank you  
23 for letting me know that.

24 So is there anything else besides that, that  
25 you would rather have done differently, yourself, as

1 did not have in 2022?

2 A. I know about REV and Arch now. And I -- they  
3 educate me more about it and be aware of the things  
4 that are going on. And --

5 Q. So did you --

6 A. Sorry.

7 Q. Sorry, that was my fault, Ms. Iglesias as far  
8 as interrupting you. Go ahead and finish. I didn't  
9 want to interrupt you. I missed that last part of what  
10 you were saying.

11 A. And that I'm not alone.

12 Q. Understood. So would you-all mind if we take  
13 a quick five-minute break as I go over some notes real  
14 quick, just to make sure I kind of didn't miss anything  
15 and make sure we're all on the same page?

16 MS. SNEAD: Yeah.

17 MR. SZUMANSKI: Great. We'll come  
18 back at 11:30, if that's all right with everybody.

19 THE VIDEOGRAPHER: Okay. We're off  
20 the record at 11:24 a.m.

21 (Off the record.)

22 THE VIDEOGRAPHER: We are now back on  
23 the record at 11:32 a.m.

24 Q. (BY MR. SZUMANSKI) All right. Ms. Iglesias,  
25 we just came back from break. I just kind of want to

1 follow-up some -- on some things you said earlier.

2 So you mentioned that in Edinburg, that you  
3 are aware of -- or you mentioned voter fraud.

4 Can you explain to me why you believe there's  
5 voter fraud in Edinburg, Texas?

6 A. Before that there was on the news and  
7 everything going on that the fed- -- federal government  
8 was down here investigating on voter fraud and things  
9 that were going on here. And I just felt like when I  
10 voted, like, I don't know who was controlling all of  
11 that. And I just didn't feel that it would ever -- and  
12 it go through, and it didn't make a difference.

13 Q. So based on that, would you agree that IDs  
14 are an important part of submitting applications for  
15 ballot by mail and mail-in ballots?

16 A. Yes.

17 Q. Why would you agree with that?

18 A. So that they could know you're a person,  
19 identification; so they can know who's voting.

20 Q. Why is that an -- why do you think that is  
21 important, as far as submitting applications for ballot  
22 by mail and mail-in ballots?

23 A. To make your vote count. To make a  
24 difference.

25 Q. And you also mentioned aware -- as we were

1 talking about awareness, right before we broke.

2 Now that you've been through the process and  
3 you are aware of REV UP and -- and Arc of Texas, would  
4 you agree with me that you have more knowledge about  
5 how to vote by mail in future elections in Texas?

6 A. Yes.

7 Q. And that means that you will have more  
8 knowledge and, as you say, make your vote count?

9 A. Yes.

10 Q. And do you also agree that having that  
11 additional information will make it easier for voters  
12 just like you to vote more effectively in future  
13 elections in Texas?

14 A. Definitely, yes.

15 Q. And do you also agree that because,  
16 sometimes, voting laws take some time to make their way  
17 to people, to voters and individuals, that voters, who  
18 now have gotten used to SB1 or Senate Bill 1, that they  
19 will know be able to cast their ballot more  
20 effectively, in future elections?

21 A. Yes.

22 Q. Why do you believe that?

23 A. I believe they have more resources and  
24 knowledge.

25 Q. So if they had more resources and knowledge



1 and they've been through the experience a little bit  
2 more, you would agree with me that now their vote would  
3 be, as you say, able to count?

4 MS. SNEAD: Objection, form.

5 A. Yes.

6 Q. (BY MR. SZUMANSKI) So you would agree with me  
7 that voter education is very important in helping  
8 voters cast their Applications for Ballot by Mail and  
9 their mail-in ballots?

10 A. Yes.

11 Q. Now, are you aware that -- as you become more  
12 aware through your experience in the 2022 elections,  
13 are you aware of the different ways that an individual  
14 can cure the Application for Ballot by Mail?

15 A. I don't understand.

16 Q. So let me try rephrasing it.

17 So are you aware of, even though you -- a  
18 voter submits an Application for Ballot by Mail, they  
19 can fix that problem in several ways?

20 A. Yes.

21 Q. Are you aware of that?

22 A. Yes.

23 Q. Okay. Do you know what those different  
24 options are?

25 A. Resubmit your application in time. Just

1 through mail.

2 Q. Understood. So in addition to news feeds and  
3 doing additional reading, are you aware that  
4 VoteTexas.org has information on how to vote by mail?

5 A. No.

6 Q. Are you aware that The Arc of Texas has  
7 information on their website about how to vote in  
8 Texas?

9 A. Now, I am.

10 Q. Have you looked at their website to see what  
11 they provide, as far as information about how to vote  
12 in Texas?

13 A. I seen a few things, but not completely gone  
14 through everything, yet.

15 Q. Is there a particular reason why you haven't  
16 gone through everything, yet?

17 A. I just been really busy, like I said, with  
18 doctors, nurses and things going on. I, usually, try  
19 to -- now, I'm going to, before I vote this next time,  
20 to really read and educate myself, before voting to see  
21 if there's anything different.

22 Q. Understood. So you would agree that being  
23 more aware is directly tied to your ability to cast a  
24 ballot effectively in an election, right?

25 A. Yes.

1 Q. So if voters go to those resources that  
2 you're mentioning, they go to REV UP Texas or The Arc  
3 of Texas and they read through that stuff, would you  
4 agree that having that information would allow them to  
5 be able to successfully cast their Applications for  
6 Ballot by Mail and their mail-in ballots?

7 A. Yes.

8 Q. Can you explain the reason why?

9 A. I believe that they could explain and speak  
10 with us, especially for people that are blind and can't  
11 really see and read and things like that. But they  
12 could get a number, or they could call us and educate  
13 us because I am also blind from one eye. And it's kind  
14 of difficult to read. I get tired, you know, but I am  
15 thankful that people take their time and explain new  
16 things that are going on to help us make -- you know,  
17 do better.

18 Q. Understood. So because of all this new  
19 knowledge and awareness you've gained and trying to, as  
20 you say, help make a difference, you would agree that  
21 your ability to cast a ballot now, under the same,  
22 current existing law, is greater, as far as being able  
23 to successfully cast an Application for Ballot by Mail  
24 or mail-in ballot?

25 MS. SNEAD: Objection, form.

1 A. No.

2 Q. (BY MR. SZUMANSKI) And why is that?

3 A. Because I believe that laws have to change,  
4 to make it easier for us to make our vote count, you  
5 know. It's very difficult on the -- the way of life we  
6 live. Until you're in that situation and you're going  
7 through something or maybe your family members or your  
8 children or someone in your family is going through  
9 something like this, then maybe, you would understand  
10 that you would want to make it easier for them, because  
11 you love and care for them.

12 Q. So you would agree that even though -- you  
13 would agree that making voting easier could sometimes  
14 have an impact on voter fraud, right?

15 A. Rephrase that?

16 Q. Sure. So you would agree -- earlier, you  
17 said that ID requirements -- you believe that ID  
18 requirements are needed, correct?

19 A. Yes.

20 Q. Because of the voter fraud that you believe  
21 is happening or has happened in the past, at least in  
22 Edinburg, Texas, correct?

23 A. Yes.

24 Q. So for example if voting was made easier and  
25 those ID requirements were not there, you would agree

1 Q. (BY MR. SZUMANSKI) Ms. Iglesias -- I  
2 understand. So, Ms. Iglesias, maybe I can help clear  
3 some things up a little bit.

4 So do you think that voters with disabilities  
5 will have a greater chance of having their Application  
6 for Ballot by Mail accepted or the mail-in ballot  
7 accepted, because of their experience from 2022  
8 elections?

9 MS. SNEAD: Objection, form.

10 A. Yes.

11 Q. (BY MR. SZUMANSKI) Do you also think that  
12 them gaining more education themselves will also help  
13 them be able to be more successful in casting an  
14 Application for Ballot by Mail or a mail-in ballot in  
15 future elections in Texas?

16 MS. SNEAD: Objection, form.

17 A. Yes.

18 Q. (BY MR. SZUMANSKI) And would you also agree  
19 that being aware of all the different options for  
20 fixing a defect on an Application for Ballot by Mail or  
21 a carrier envelope or any of those different  
22 vote-by-mail mechanisms, do you -- would you agree that  
23 having more information and understanding of those  
24 options would allow voters with disabilities the  
25 ability to be more successful in casting Applications